

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Angelique D. Bridges Debtor(s) Citizens Bank, N.A. f/k/a RBS Citizens, N.A. s/b/m to CCO Mortgage Corp. Objectant(s) v. Angelique D. Bridges Respondent(s)	Chapter 13 Proceeding No. 19-16106 AMC
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OBJECTION TO CONFIRMATION OF THE PLAN

Citizens Bank, N.A. f/k/a RBS Citizens, N.A. s/b/m to CCO Mortgage Corp., a secured creditor in this case objects to the Plan and to the confirmation of the debtor's Chapter 13 Plan and as grounds therefor would show the court the following:

1. The Plan does not provide for the secured creditor, Citizens Bank, N.A. f/k/a RBS Citizens, N.A. s/b/m to CCO Mortgage Corp. to receive the full value of its claim in violation of 11 USC §1325(a)(5)(B)(ii).
2. As of the date of the filing of the bankruptcy on September 27, 2019, Citizens Bank, N.A. f/k/a RBS Citizens, N.A. s/b/m to CCO Mortgage Corp. is the holder of a secured claim in the amount of \$91,840.68 against the debtors' property located at 4224 Levick Street, Philadelphia, PA 19135. On that date the arrears to be paid through the plan were \$15,323.08. A Proof of Claim was filed by Citizens Bank, N.A. f/k/a RBS Citizens, N.A. s/b/m to CCO Mortgage Corp. on or about November 8, 2019. See Exhibit "A" attached hereto and made a part hereof.

3. Debtor's Plan proposes to pay CCO Mortgage Corp. \$10,000.00 in pre-petition arrears, an amount substantially smaller than Citizens Bank, N.A. f/k/a RBS Citizens, N.A. s/b/m to CCO Mortgage Corp.'s arrears claim.
4. If the Plan is confirmed the Citizens Bank, N.A. f/k/a RBS Citizens, N.A. s/b/m to CCO Mortgage Corp. will suffer irreparable injury, loss and damage.

Respectfully submitted,

/s/ Mary F. Kennedy
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